

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RONALD KOONS, *et al.*

Plaintiffs

v.

WILLIAM REYNOLDS, *et al.*

Defendants

AARON SIEGEL, *et al.*

Plaintiffs,

v.

MATTHEW PLATKIN, *et al.*

Defendants.

Civil Action No. 1:22-cv-07464-
RMB-AMD

CIVIL ACTION

(ELECTRONICALLY FILED)

CONSOLIDATED ACTIONS

**DECLARATION OF RIA JAIRAM IN SUPPORT OF SIEGEL
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

1. I, Ria Jairam, am a member of Plaintiff Association of New Jersey Rifle & Pistol Clubs, Inc. I am over the age of 18, have personal knowledge of the facts

and events referred to in this Declaration, and am competent to testify to the matters stated below.

2. I am what is often referred to as a monetized YouTuber. I make films and upload them to YouTube.com, where both subscribers to my channel and non-subscribers view my films. I have more than 13,000 subscribers to my YouTube.com channel. Every time a person views my films, I am paid money by YouTube.com.

3. Most of my films involve educating my viewers on various aspects of amateur (“ham”) and other radio communications. I frequently film in public locations.

4. Linked below is one of my films, shot on location in Lincoln Park, New Jersey. The film depicts a test I conducted of a Retevis General Mobile Radio Service (“GMRS”) radio. The film begins inside the home of a friend. I then walk outside on public streets to test the performance of the radio’s antenna.

<https://www.youtube.com/watch?v=ZUFkHx76Fgk>

5. Here is another one of my films. This one was filmed on Garrett Mountain at Rifle Camp Park in Passaic County, New Jersey showing various radio activities taking place.

<https://www.youtube.com/watch?v=ToWg8FOG5ps>

6. I currently hold a New Jersey permit to carry a handgun. I would carry my handgun while making these films in public, but I refrain from doing so because of Chapter 131 Section 7(a)(23), as I fear arrest and prosecution.

I declare under penalty of perjury that the foregoing is true and correct.

Executed within the United States.



Ria Jairam

2/7/2023

Date